

**UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA**

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	17-cr-64-DWF-KMM
	)	
v.	)	<b>DEFENDANT’S UNOPPOSED</b>
	)	<b>MOTION TO EXTEND FILING</b>
EDWARD S. ADAMS,	)	<b>DEADLINE</b>
	)	
Defendant.	)	

Mr. Adams respectfully requests a modest extension (15 days) of the current briefing deadlines set forth in the January 23, 2018 Scheduling Order (ECF No. 88). Under this proposal, Mr. Adams’s new motions and memoranda in support of his existing motions would be due on or before **May 15** (as opposed to April 30), the government’s responses would be due on or before **June 12** (as opposed to May 28), and Mr. Adams’s replies would be due on or before **June 26** (as opposed to June 11).

Mr. Adams believes that this limited extension is justified for the following reasons:

- Judge Frank has not yet ruled on the Report & Recommendation relating to the Murry and Apollo privileges issues, and these issues will inform Mr. Adams’s motions. *See* ECF Nos. 117, 119, 120.
- Mr. Adams’s request for the unredacted Relativity database log remains pending, *see* ECF Nos. 127 & 128, and the government has not yet produced

the information that it has agreed to produce, *see* ECF No. 127. This information will inform Mr. Adams's motions.

- This Court has noted that it will establish briefing guidelines (page or word limitations), but those guidelines are not yet known to Mr. Adams.
- Counsel for Mr. Adams and counsel for the government have met and conferred about Mr. Adams's privilege log, and counsel for the government has stated that it will need additional information about Mr. Adams's assertions of privilege in order to respond to Mr. Adams's upcoming briefing. Mr. Adams is willing to supplement his privilege log to provide certain additional information about the documents to which he will refer in his briefs, as well as certain other documents over which Mr. Adams is asserting a privilege. However, counsel for Mr. Adams will need additional time in order to supplement his privilege log by the time that he submits his briefs.

Counsel for Mr. Adams has met and conferred with the government regarding this proposal. Counsel for the government has no objection to the 15 day extension to the current briefing deadlines, subject to Mr. Adams's agreement to provide certain supplementation of his privilege log at the time that Mr. Adams files his briefs.

Dated: April 18, 2018

Respectfully submitted,

/s/ Lance Wade

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